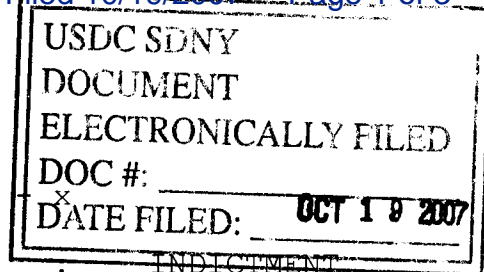


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

v.

: 07 Cr.

MARTIN AMOAH,  
a/k/a "Michael Taquan Thompson"  
a/k/a "Isaac Abrokwah"

**07:CRIM 974**

Defendant.

- - - - - X

COUNT ONE

The Grand Jury charges:

1. On or about August 11, 2005, in the Southern District of New York, MARTIN AMOAH, a/k/a "Michael Taquan Thompson," a/k/a "Isaac Abrokwah," the defendant, unlawfully, willfully, and knowingly did make a false statement in an application for a passport with the intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, to wit, AMOAH, falsely claiming to be someone he is not, submitted an application for a United States passport in another individual's name and using identification documents belonging to that other individual.

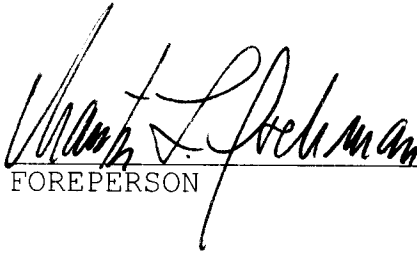
(Title 18, United States Code, Section 1542.)


COUNT TWO

The Grand Jury further charges:

2. On or about August 11, 2005, in the Southern District of New York, MARTIN AMOAH, a/k/a "Michael Taquan Thompson," a/k/a "Isaac Abrokwhah," the defendant, unlawfully, willfully, and knowingly, during and in relation to a felony violation enumerated in Section 1028A(c) of Title 18, to wit, the felony offense charged in Count One, did transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, AMOAH used another individual's birth certificate and social security number without lawful authorization to apply for a United States passport.

(Title 18, United States Code, Section 1028A.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

MARTIN AMOAH,  
a/k/a "Michael Taquan Thompson"  
a/k/a "Isaac Abrokwhah"

Defendant.

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INDICTMENT

07 Cr.

(18 U.S.C. §§ 1028A, 1542)

MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

Walter L. Johnson Oct. 19, -07  
Foreperson.

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RC  
10/19/07

Indictment filed, Judge Heska  
assigned